

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

v.

PAUL JOSEPH WILSON,

Defendant.

CASE NO. 1:19-CR- 102

STATEMENT OF FACTS

The United States and the Defendant, PAUL JOSEPH WILSON, agree that the following facts, as well as the allegations in Count One of the Criminal Information, are true and correct, and that if the matter had gone to trial, the United States would have proven them beyond a reasonable doubt with admissible and credible evidence:

1. In 2013, WILSON lived in a dormitory on campus at a school in Washington, D.C. While living at this school, he used a desktop computer to subscribe to newsgroups under the user name "slothor." Newsgroups are subscription-based news and information services covering an extremely wide variety of topics. Individual users "subscribe" to topics of interest and the program delivers the newest articles or postings for that topic. WILSON subscribed to a number of newsgroups with names suggestive of child pornography and child erotica, including the following: "alt.binaries.picture.hussy," "alt.binaries.picture.ls-series," "alt.binaries.pictures.erotica.schoolgirls," "alt.binaries.picture.erotica.ls-series," "alt.binaries.pictures.bdcompany," "alt.binaries.preadolescents," "alt.binaries.pictures.newstar," "alt.binaries.pictures.nymphets," and "alt.hipclone.sex.jailbait." "Hussy," "ls-series," "bdcompany," "newstar," "nymphets," and "jailbait" are all known child pornography terms.

2. On April 21, 2013 and again on August 1, 2013, WILSON downloaded files

through his newsgroups subscriptions that could be decoded into images depicting child pornography, including the following:

- a. On April 21, 2013, WILSON downloaded a file from the newsgroup "alt.binaries.picture.ls-series" that decoded to an image entitled "lsp-001b-056." The image depicted a minor female who is approximately between the ages of 8 and 10 years old. She is pictured nude, sitting on a white fur rug. She is wearing black and silver high heel shoes with a silver wrap around her waist. She is leaning back with her legs spread and her genitalia are clearly visible.
 - b. On August 1, 2013, WILSON downloaded a file from the newsgroup "alt.binaries.picture.bdcompany" that decoded to an image entitled "bd-hot_23.2.08-027." The image depicted a female who is approximately between the ages of 8 and 10 years old. She is pictured nude squatting down with her back against a tree, legs spread, and one leg extended. Her genitalia is clearly visible as the focus of the image.
3. At some point between April 21, 2013 and June 3, 2014, WILSON moved from the school dormitory in Washington, D.C. to an apartment in Annandale, Virginia, which is in the Eastern District of Virginia. When he moved, he took the desktop computer containing child pornography files with him to Virginia. In so doing, WILSON caused child pornography files to be transported in interstate commerce.
4. On September 28, 2014, while living in Annandale, Virginia, WILSON registered an account with the Tor network website "Playpen," which was dedicated to the advertisement and distribution of child pornography. Between September 28, 2014 and March 5, 2015, WILSON logged onto Playpen several times and accessed a number of pages containing or

advertising child pornography, including the following:

- a. On February 26, 2015, WILSON accessed a post on Playpen that contained a link to a series of photographic images that depicted a pre-pubescent female child engaged in oral and vaginal sex with an adult male.
- b. On February 26, 2015, WILSON accessed a post on Playpen that contained a link to a collage of photographic images that depicted pre-pubescent female children engaged in oral and vaginal sex with adult men.

5. On July 15, 2015, law enforcement executed a search warrant at WILSON's apartment in Annandale, Virginia and seized the black desktop computer, which contained seven hard drives. A later forensic analysis of that computer revealed, among other things, thousands of child pornography images, either in unallocated space or in thumbnail form.

6. On July 15, 2015, FBI agents interviewed WILSON on campus at the school in Washington, D.C. During this interview, WILSON admitted to downloading and viewing child pornography, including through websites on the Tor network.

7. This statement of facts includes those facts necessary to support the plea agreement between WILSON and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding WILSON's case.

8. The actions of WILSON, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

9. This Statement of Facts shall be admissible as a knowing and voluntary confession in any proceeding against WILSON regardless of whether the Plea Agreement is presented to or accepted by a court. Moreover, WILSON waives any rights that he may have


under Fed. R. Crim. P. 11(f), Fed. R. Evid. 410, the United States Constitution, and any federal statute or rule in objecting to the admissibility of this Statement of Facts in any such proceeding.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

Date: April 5, 2019

By:



Kyle P. Reynolds
Special Assistant United States Attorney (LT)
Nathaniel Smith, III
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, PAUL JOSEPH WILSON, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

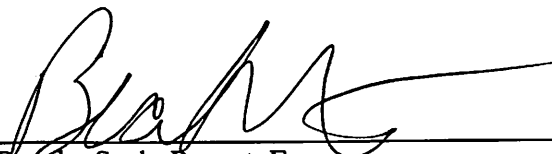
Date: 4/5/19



PAUL JOSEPH WILSON

I am PAUL JOSEPH WILSON'S attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 4/1/19



Brooke Sealy Rupert, Esq.
Attorney for PAUL JOSEPH WILSON